

# **EXHIBIT D**

1 UNITED STATES BANKRUPTCY COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
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5 \_\_\_\_\_  
6 In re: )  
 )  
7 PG&E CORPORATION, )  
8 and ) No. 19-30088 (DM)  
9 PACIFIC GAS AND ELECTRIC COMPANY,) Chapter 11  
10 Debtors. )  
11 \_\_\_\_\_ )  
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13  
14 VIDEOTAPED 30(b)(6) DEPOSITION OF JASON WELLS  
15 San Francisco, California  
16 Friday, October 11, 2019  
17 Volume I  
18

19  
20 Reported by:  
21 CATHERINE A. RYAN, RMR, CRR  
22 CSR No. 8239  
23 Job No. 3565644  
24

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10 PACIFIC GAS AND ELECTRIC COMPANY,) Chapter 11  
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12 \_\_\_\_\_)

13  
14  
15 Videotaped 30(b)(6) deposition of  
16 JASON WELLS, Volume I, taken on behalf of the  
17 Official Committee of Tort Claimants, at Walkup,  
18 Melodia, Kelly & Schoenberger, 650 California  
19 Street, 26th Floor, San Francisco California,  
20 beginning at 10:31 a.m. and ending at 4:49 p.m., on  
21 Friday, October 11, 2019, before CATHERINE A. RYAN,  
22 Certified Shorthand Reporter No. 8239.  
23  
24  
25

1 conclusion. Also, I'm not sure this is in the 10:47:31  
2 scope, but he can answer.

3 THE WITNESS: May I -- may I have a minute  
4 to read it?

5 MR. RICHARDSON: Sure. 10:47:39

6 (Pause.)

7 THE WITNESS: I don't recall the purpose  
8 of this provision.

9 BY MR. RICHARDSON:

10 Q Are you familiar at all with California 10:48:06  
11 insurance regulations?

12 A Vaguely, as it's come up in the -- the --  
13 in and around these topics.

14 Q At any point in the negotiations, did the  
15 subrogation claim holders demand that a settlement 10:48:22  
16 with the debtors include payment of fire victims'  
17 deductibles?

18 A I don't recall that demand, but I,  
19 personally, wasn't part of the settlement  
20 negotiations directly as part of the process to 10:48:38  
21 assess the -- what the company was willing to offer  
22 and ultimately settle for.

23 Q At any time during the negotiations, did  
24 you hear any discussion suggesting that the  
25 subrogation claim holders intended to allocate part 10:48:52

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1 of their settlement to fire victims' deductibles? 10:48:55

2 A I had not heard that, no.

3 MR. ORSINI: Are we done with this one?

4 MR. RICHARDSON: Yes.

5 Exhibit 4. 10:49:20

6 (Exhibit 002-BK-004 was marked for

7 identification.)

8 THE WITNESS: Thank you.

9 BY MR. RICHARDSON:

10 Q Now, I realize your name is not on this 10:49:51

11 email chain, so I won't ask you if you've seen the

12 email, but do you see in the first line where

13 there's a reference a draft of the side letter

14 agreement between the Baupost Creditors and PG&E?

15 A I see that reference in the attachments, 10:50:05

16 yes.

17 Q Are you familiar with a side letter

18 agreement between the Baupost Creditors and PG&E?

19 MR. ORSINI: Objection. Scope.

20 But you can answer. 10:50:16

21 THE WITNESS: I'm not aware of any side

22 letter agreement. I do see reference in the body of

23 the email to a Nondisclosure Agreement, and I am

24 aware of that.

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